

Mark Ahlemeyer, OSB No. 095997
Assistant Federal Public Defender
Email: mark_ahlemeyer@fd.org
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORLTAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:19-cr-00183-MO

Plaintiff,

v.

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED
MOTION TO CONTINUE TRIAL
DATE**

LORI E. DEVENY,

Defendant.

I, Mark Ahlemeyer, declare:

1. I am the attorney appointed to represent Lori Deveny in the above-entitled case.
2. A jury trial in this case is currently scheduled for October 29, 2019. Ms. Deveny was arraigned on May 13, 2019. One continuance has been sought by the defense.

3. Ms. Deveny has received discovery and the defense is conducting investigation in her case, including obtaining information relating to circumstances of the offense and Ms. Deveny's background. This information relates to pretrial litigation, trial, and sentencing. Ms. Deveny therefore respectfully requests that this Court continue her case for a period of approximately 90 days to January 27, 2020, or a date thereafter convenient to the Court to accomplish these tasks.

4. I have discussed with Ms. Deveny her right to a speedy trial. She agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A) of the Speedy Trial Act.

5. Assistant United States Attorney Claire Fay has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on October 15, 2019, in Portland, Oregon.

/s/ Mark Ahlemeyer
Mark Ahlemeyer
Attorney for Defendant